



DATE: March 10, 1993

TO: Rob Watson

FROM: David Mick *DM* *Kurt*

SUBJECT: Review of Draft Groundwater RD Work Plan



RE: 2018080001 -- Winnebago County
Winnebago Reclamation Landfill (Pagel's Pit)
Superfund/Technical File

As requested, the groundwater-related sections of the reports entitled, "Remedial Design/Remedial Action Work Plan" and "Groundwater RD Work Plan" have been reviewed for potential ARARS. Both reports are dated February, 1993.

The documents do not identify applicable State ARARS and as a result cannot be reviewed for specific applicable ARARS. The following comments address anticipated State ARARS for groundwater protection at the facility:

1. 35 IAC 811 regulations apply to new solid waste landfills. These regulations appear to apply since the "Remedial Design/Remedial Action Work Plan" states in Section 2.1 that the facility is a permitted, active solid-waste landfill and states in Section 4.1.2 that anticipated permit requirements include Illinois landfill regulations 35 IAC 811. 35 IAC 811 should be reviewed for specific requirements of establishing a remedial action, however the general requirements are:

a. Identify the constituents to be monitored based upon the criteria in 35 IAC 811.319(a)(2).

b. Establish the background concentration for identified constituents, especially for those constituents without a 35 IAC 620 Standard, as required by 35 IAC 811.320(a)(1).

c. Determine the rate and extent of contamination and implementation of 35 IAC 811.319(d) Remedial Action as required by 35 IAC 811.319(b)(3).

d. Establish a groundwater monitoring program following the requirements of 35 IAC 811.319.

2. 35 IAC 620 Groundwater Quality Standards apply to all groundwaters of the State. The 620 Standards require the classification of groundwater to determine when remediation is necessary and to establish clean-up objectives for any groundwater remediation performed at the site. In addition, the 620 Standards allow for the establishment of a

Groundwater Management Zone following 35 IAC 620.250. The Groundwater Management Zone may be established in the region containing groundwater contamination and for which adequate remediation is being undertaken.

3. 77 IAC 920 Illinois Water Well Construction Code apply to the construction of groundwater monitoring wells. Borings and wells to be abandoned should also follow the plugging requirements of 77 IAC 920.

DM:

cc: Rockford Region